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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 UNITED STATES OF AMERICA,)
10 Plaintiff,) CASE NO. 2:15-CR-00212-JCM-NJK
11 vs.)
12 CHARLES PARKIN,)
13 Defendant.)
14

15 **STIPULATION TO CONTINUE SENTENCING HEARING**
16 **(Second Request)**

17 IT IS HEREBY STIPULATED AND AGREED, between the United States of America, by
18 and through its attorney, Christopher Chiou, Acting United States Attorney, through Simon Kung,
19 Assistant United States Attorney; and Defendant Charles Parkin, by and through his counsel, Russell
20 E. Marsh, Esquire, Wright Marsh & Levy, that the Sentencing Hearing currently scheduled for May
21 26 2021, be vacated and set to a date and time convenient to this Court, but no sooner than 30 days
22 from the current hearing date.

23 This stipulation is entered into for the following reasons:

- 24 1. This matter is currently set for Sentencing on May 26, 2021, at 10:00 a.m. (ECF Nos.
25 126, 127.)
- 26 2. Counsel for Mr. Parkin will be out of state on a family matter on the currently
27 scheduled date. Counsel also requires additional time to prepare the Sentencing Memorandum and
28 to gather letters of support and other documents for sentencing.

1 3. Counsel for Mr. Parkin is also unavailable the week of July 5, 2021. Counsel is
2 scheduled for a sentencing in Miami, Florida that week in United States v. Serbera, Case No. 1:19-
3 cr-205900RNS (S.D. Fla.).

4 4. The parties agree to continue the Sentencing Hearing for 30 days. Mr. Parkin is out
5 of custody and agrees to the continuance.

6 5. Additionally, denial of this request for continuance could result in a miscarriage of
7 justice.

8 6. The additional time requested by this Stipulation is made in good faith and not for
9 purposes of delay.

10 7. This is the second request for a continuance of the Sentencing Hearing.

11 Dated this 12th day of May, 2021.

12 Respectfully submitted:

13 WRIGHT MARSH & LEVY

CHRISTOPHER CHIOU
ACTING UNITED STATES ATTORNEY

14
15 BY /s/ Russell E. Marsh
16 RUSSELL E. MARSH, ESQUIRE
Attorney for Defendant Parkin

BY /s/ Simon Kung
SIMON KUNG
Assistant U.S. Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,)
4 Plaintiff,)
5 vs.)
6 CHARLES PARKIN,)
7 Defendant.)
8


CASE NO. 2:15-CR-00212-JCM-NJK

ORDER

9 Based on the Stipulation of the parties, the Sentencing Hearing in this matter is hereby
10 continued. The ends of justice served by granting said continuance outweigh the best interest of the
11 public and the defendant in a hearing, since the failure to grant said continuance would be likely to
12 result in a miscarriage of justice, and would deny the parties herein sufficient time and the
13 opportunity within which to be able to effectively and thoroughly prepare for the hearing, taking into
14 account the exercise of due diligence.

15 IS IT HEREBY ORDERED that the Sentencing Hearing in the above-captioned matter
16 currently scheduled for May 26, 2021, at 10:00 a.m., be vacated and continued to
17 July 14, 2021 at 10:00 a.m..

18 DATED: May 14, 2021.

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21 JAMES C. MAHAN
22 United States District Judge
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